

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

CONTIQUE WILLCOT,

Plaintiff,

v.

SECURITIES AND EXCHANGE

COMMISSION *et al.*,

Defendants.

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CAUSE NO. 7:24-CV-00317-DC-RCG

**AGREED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Under Federal Rule of Civil Procedure 6(b), Defendant Ari Rubenstein requests an extension of time from May 5, 2025, to May 8, 2025, to respond to Plaintiff's Amended Complaint (ECF No. 3). There is good cause for this extension because:

1. This motion is Mr. Rubenstein's first request for an extension of time with respect to this time limitation.
2. Counsel for Mr. Rubenstein conferred with *pro se* Plaintiff Contique Willcot, and Plaintiff agreed to the requested extension.
3. Mr. Rubenstein requires more time to respond to the Amended Complaint because of its breadth. The Amended Complaint is seventy-eight pages with 285 numbered allegations and many unnumbered allegations. The Amended Complaint also has eight counts (six against Mr. Rubenstein) and seeks declaratory as well as injunctive relief on a variety of statutory and constitutional bases.

4. Such extension of time will not delay these proceedings, as the Court has previously granted extensions of time to certain of Mr. Rubenstein's co-defendants through May 8 for their responsive pleadings.

Mr. Rubenstein thus respectfully moves for an extension of time from May 5, 2025, to May 8, 2025, to file an appropriate motion or otherwise respond to the Amended Complaint.

Respectfully submitted,

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/s/ Land Murphy

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**Full admission application forthcoming*

**COUNSEL FOR DEFENDANT
ARI RUBENSTEIN**

CERTIFICATE OF CONFERENCE

As required by Local Rule CV-7, on April 16, 2025, Stephen Fraser, counsel for Defendant Ari Rubenstein, conferred via e-mail with Plaintiff regarding the relief requested herein. That same day, Plaintiff agreed to an extension of time until May 8, 2025, for Mr. Rubenstein to respond to the Amended Complaint.

/s/ Stephen A. Fraser
Stephen A. Fraser

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to:

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